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October 31, 2022

VIA ECF

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

Re: *Farhad Azima v. Dechert LLP, et al.*
Civil Case No. 22-cv-8728 (PGG)

Dear Judge Gardephe:

We write on behalf of our clients, Nicholas Del Rosso and Vital Management Services, Inc. (collectively, “VMS Defendants”), to respectfully request an uncontested extension of time for the VMS Defendants to respond to Plaintiffs’ Complaint. The VMS Defendants request that their time to answer or otherwise respond to the Complaint be extended by 30 days, from November 14, 2022, to December 14, 2022. Plaintiffs consent to this request.

In addition, Plaintiffs request that, should the VMS Defendants submit a pre-motion conference letter requesting to file a motion to dismiss the Complaint, Plaintiffs’ time to respond to the VMS Defendants’ letter be extended from three business days to five business days. The VMS Defendants consent to Plaintiffs’ extension request.

This is the VMS Defendants’ first extension request. The extension is requested due to the magnitude of the Complaint and the associated Exhibits. The VMS Defendants require additional time to review the Complaint, consider the allegations, and evaluate potential bases that may exist to seek dismissal of the Complaint.

Accordingly, the VMS Defendants respectfully request: (1) a 30-day extension of time to answer or otherwise respond to the Complaint, and (2) that, should the VMS Defendants submit a pre-motion conference letter requesting to file a motion to dismiss the Complaint, Plaintiffs’ time to respond to the VMS Defendants’ letter be extended from three business days to five business days.

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Respectfully submitted,

**NELSON MULLINS RILEY &
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cc: All counsel of record (by ECF)